

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

MAGNOLIA ISLAND PLANTATION,
L.L.C., ET AL

CIVIL ACTION NO. 5:18-cv-1526

V.

DISTRICT JUDGE S. MAURICE HICKS

LUCKY FAMILY, L.L.C., ET AL

MAG. JUDGE KAYLA D. MCCLUSKY

DEFENDANTS W. A. LUCKY, III AND LUCKY FAMILY, L.L.C.’S
MOTION TO EXTEND DEADLINE TO RESPOND TO
PLAINTIFF BARBARA LOLLAR’S
AMENDED MOTION FOR PARTIAL SUMMARY JUDGMENT

NOW INTO COURT, through undersigned counsel, come Defendants, W.A. LUCKY, III and LUCKY FAMILY, L.L.C., who request this Court for a brief extension of time to respond to Plaintiff Barbara Lollar’s Amended Motion for Summary Judgment as follows:

1.

On November 2, 2022, Plaintiff, Barbara Lollar (“Lollar”) filed a Motion for Partial Summary Judgment (Doc. 191) with Memorandum in Support of Motion for Summary Judgment (Doc. 191-1).

2.

This Court issued a Notice of Motion Setting, setting the deadline for opposition on November 16, 2022 (Doc. 192).

3.

On November 12, 2022, Plaintiff Lollar filed an Amended Motion for Partial Summary Judgment (Doc. 198) with Memorandum in Support of Motion for Summary Judgment (Doc. 198-1).

4.

This Court issued a Notice of Motion Setting, setting the deadline for opposition on November 28, 2022 (Doc. 199).

5.

Counsel for Defendants have had multiple briefing deadlines and hearings in the interim which have caused them to be unable to complete the opposition due.

6.

Further, November 24th through 27th, 2022, is the Thanksgiving holiday and counsel for Defendants will be traveling out of town for the same. Additionally, counsel for Defendant, Lucky Family, LLC has a previously planned vacation in New York City, New York scheduled for November 29, 2022, through December 3, 2022, and she will not return to the office until December 4, 2022.

7.

In this regard, the undersigned counsel requests a 14-day extension of time or until December 12, 2022, to file an opposition. The Scheduling Order in this case set November 30, 2022, as the deadline for the filing of dispositive motions; therefore, the requested extension should not upset the trial date or any other date set in the Scheduling Order.

8.

Defendants' counsel contacted Plaintiff Lollar's counsel, and he does not oppose the filing of this motion, provided that the Plaintiff Lollar is allowed a corresponding extension.

For this good cause shown, Defendants, W.A. LUCKY, III and LUCKY FAMILY, L.L.C., respectfully request that their Motion to Extend Deadline to Respond to Plaintiff Lollar's Amended Motion for Summary Judgment be granted, and a new deadline for Defendants to file their Oppositions be set for December 12, 2022, with a corresponding deadline for Plaintiff Barbara Lollar to file a Reply. The granting of this motion will not result in unnecessary delays

Respectfully submitted,

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